

Kent Ries, Attorney at Law
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COUNSEL FOR TRUSTEE

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

IN RE:	§	
	§	Case No. 08-20297-RLJ-7
RALPH LYLE CRUM,	§	
	§	Hearing set for September 11, 2008
Debtor.	§	at 1:30 p.m.

TRUSTEE'S OBJECTION TO DEBTOR'S CLAIMED EXEMPTIONS

TO THE HONORABLE ROBERT L. JONES, BANKRUPTCY JUDGE

COMES NOW, Kent Ries, Trustee of this Chapter 7 bankruptcy estate, and files this his Objection to Debtor's Claimed Exemptions, and in support thereof would respectfully show unto the Court as follows:

1. Debtor filed for relief under Chapter 7 of the United States Bankruptcy Code on May 30, 2008. Kent Ries was subsequently appointed to serve as the Trustee over the bankruptcy estate.
2. This Court has jurisdiction over the subject matter of this Objection pursuant to 28 U.S.C. § 1334. The matter is core pursuant to 28 U.S.C. § 157(b)(2)(B).
3. Debtor has claimed his exemptions under Texas Law.
4. Debtor has claimed household goods, furnishings, and other personal property with a scheduled value in excess of \$92,000.00 as exempt, and stated the basis for same as Texas Property

Code §42.001(a) and 42.002 (a). The Trustee objects to this claim as it is on its face in excess of the allowed amount of \$30,000.00 of personal property exempt under the referenced Texas statutes.

5. Debtor has also claimed interests in retirement and IRA accounts, with a total scheduled value of \$304,062.23, as exempt and stated the basis for same as Texas Property Code §42.0021. The Debtor has not met the requirements of this section to exempt these assets. Further, the Debtor has paid amounts into these plans in fraud of his creditors, which is a basis for a denial of any exemption claim made by the Debtor for these assets.

WHEREFORE, PREMISES CONSIDERED, Kent Ries, Trustee herein, respectfully prays for an order of this Court denying the exemptions claimed by the Debtor and for such other relief, at law or in equity, to which the Trustee may show himself justly entitled.

Respectfully submitted,

KENT RIES, ATTORNEY AT LAW
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By: /s/ Kent Ries

Kent Ries
State Bar No. 16914050

COUNSEL FOR TRUSTEE

CERTIFICATE OF SERVICE

I, Kent Ries, hereby certify that on the 25th day of July, 2008 a true and correct copy of the foregoing Objection to Exemptions was served electronically or mailed in the United States mail, postage prepaid, to the parties listed below:

United States Trustee
1100 Commerce Street, Room 9C60
Dallas, Texas 75242

Ralph Lyle Crum
7003 Covenant Lane
Amarillo, Texas 79109

Van Northern
Northern Law Firm
112 W. 8th, Suite 400
Amarillo, Texas 79101

/s/ Kent Ries
Kent Ries